

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHESTER COUNTY
Court of Common Pleas

The Honorable Brian M. Gibbons, Circuit Court Judge

Case No. 2018-CP-12-0334
Appellate Case No. 2018-001991

Angela BainAppellant

v.

Denise C. Lawson and Kenneth L. ChildsRespondents.

DESIGNATION OF MATTER TO BE
INCLUDED IN THE RECORD ON APPEAL

RECEIVED

APR 10 2019

SC Court of Appeals

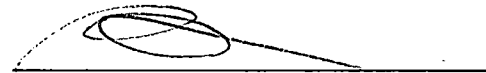
Respondents propose the following be included in the Record on Appeal:

1. Complaint and Exhibits A, B, C, and D filed July 23, 2018.
2. Motion to Dismiss of Respondent Lawson filed August 9, 2018.
3. Motion to Dismiss of Respondent Childs filed August 17, 2018
4. Motion to Strike of Respondent Childs Filed August 17, 2018
5. Memorandum in Support or Respondent Childs' Motion to Dismiss filed August 17, 2018.
6. Appellant's Response in Opposition to Respondent Childs' Motion to Strike filed September 18, 2018.

7. Appellants Response in Opposition to Respondent Childs' Motion to Dismiss filed September 18, 2018.
8. Appellant's Response in Opposition to Respondent Lawson's Motion to Dismiss filed September 18, 2018.
9. Transcript of Hearing on September 26, 2018 before the Honorable Brian M. Gibbons.
10. Appellant's Supplemental Memorandum in Opposition to Respondents' Motion and Exhibit 1 filed October 2, 2018.
11. Respondent Childs' Supplemental Memorandum in Support of Motions and Exhibits 1, 2, and 3 filed October 3, 2018
12. Form 4 Order Filed October 4, 2018.
13. Order Denying Respondent Lawson's Motion to Dismiss filed October 16, 2018.
14. Order Granting Motion and Dismissing Action Against Defendant Childs filed October 26, 2018.
15. Appellant's Motion for Reconsideration filed November 2, 2018.
16. Order Denying Appellant's Motion for Reconsideration filed November 5, 2018.

Respondent objects to the inclusion of items 14, 15 and 17 in Appellant's Proposed designation as all of those items are irrelevant because they are merged into the Court's Orders (Appellant's No. 16 and 18)

I certify that this designation contains no matter which is irrelevant to this appeal.



Michael H. Montgomery (SC Bar #4034)
Montgomery Willard, LLC
Post Office Box 11886
Columbia, South Carolina 29211
(803) 779-3500
(803) 799-2755 (fax)
mhm@montgomerywillard.com

Attorneys for Respondent
Kenneth L. Childs

April 10, 2019

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM CHESTER COUNTY
Court of Common Pleas

The Honorable Brian M. Gibbons, Circuit Court Judge

Case No. 2018-CP-12-0334
Appellate Case No. 2018-001991

Angela BainAppellant
v.
Denise C. Lawson and Kenneth L. ChildsRespondents.

CERTIFICATE OF SERVICE

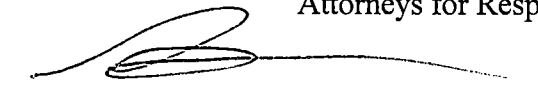
I certify that I have served the Respondent Kenneth L. Childs' Designation of Matter on J. Lewis Cromer, Shannon M. Polvi and Eugene H. Matthews by depositing it in the United States Mail, postage prepaid on April 10, 2019, addressed to them at the following addresses:

J. Lewis Cromer
Shannon M. Polvi
CROMER BABB PORTER & HICKS, LLC
P.O. Box 11675
Columbia, SC 29211

Eugene H. Matthews
RICHARDSON PLOWDEN
& ROBINSON, P.A.
P.O. Drawer 7788
Columbia, SC 29202

Attorneys for Appellant

Attorneys for Respondent Denise Lawson



Michael H. Montgomery
Montgomery Willard, LLC
1002 Calhoun Street
Post Office Box 11886
Columbia, South Carolina 29211-1886
Telephone: (803) 779-3500

ATTORNEY FOR THE RESPONDENT
KENNETH L. CHILDS

RECEIVED
APR 10 2019
SC Court of Appeals

MONTGOMERY WILLARD, LLC
ATTORNEYS AND COUNSELORS AT LAW
1002 CALHOUN STREET
COLUMBIA, SOUTH CAROLINA 29201

(803) 779-3500

MICHAEL H. MONTGOMERY
MHM@MONTGOMERYWILLARD.COM
DIRECT DIAL No. (803) 753-6484

POST OFFICE BOX 11886
COLUMBIA, SOUTH CAROLINA 29211-1886

CERTIFIED CIVIL MEDIATOR

FACSIMILE (803) 799-2755
WORLD WIDE WEB [HTTP://WWW.MONTGOMERYWILLARD.COM](http://www.MONTGOMERYWILLARD.COM)

April 10, 2019

Via Hand Delivery

Honorable Jenny Abbott Kitchings
Clerk of South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

Re: *Angela H. Bain v. Kenneth L. Childs and Denise C. Lawson*
Appellate Case Number: 2018-001991
Civil Action Number: 2019-CP-12-00334
Our File No.: 2186250

Dear Ms. Kitchings:

Enclosed please find attached the Respondent, Kenneth L. Childs Initial Brief of Respondent and Designation of Matter to be Included in the Record and Proof of Service.

Please file the original and keep the six copies. Please clock the four copies and return to the courier.

Please do not hesitate to contact me if you have any questions.

With kind regards, I am

Very truly yours,

MONTGOMERY WILLARD, LLC

Cristy Bradley

Cristy Bradley
Paralegal to Michael H. Montgomery

RECEIVED
APR 10 2019
SC Court of Appeals